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Attorneys for Plaintiff Becky Wright

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BECKY WRIGHT,

Plaintiff,

v.

STANDARD INSURANCE COMPANY,

Defendant.

Case No. 3:18-cv-1948-YY

**JOINT STIPULATED MOTION FOR
EXTENSION OF REMAINING CASE
DEADLINES**

CERTIFICATION PER L.R. 7.1

The undersigned have conferred and agree upon the contents of this motion.

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**JOINT STIPULATED MOTION FOR EXTENSION OF
REMAINING CASE DEADLINES - p. 1 of 2**

Megan E. Glor
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101

MOTION

The undersigned hereby jointly move this Court for an order extending the remaining case deadlines by 30 days. The purpose of this request is to allow sufficient time for this Court to adjudicate Plaintiff's forthcoming opposed *Motion to Reopen and Extend the Discovery Deadline for the Purpose of Taking a Deposition Pursuant to Fed. R. Civ. P. 30 (b)(6)*. Plaintiff's undersigned counsel anticipates filing that motion by Tuesday, October 15, 2019. The parties have conferred and Defendant opposes the motion.

The parties propose the following new case deadlines:

Deadline to file stipulated record for judicial review: Extension from October 16, 2019 to November 15, 2019;

Dispositive motions deadline: Extension from October 23, 2019 to November 22, 2019 (with Response and Reply deadlines pursuant to Local Rule).

For the foregoing reasons, the parties respectfully request that this Court reset the case deadlines as set forth herein.

DATED: October 11, 2019.

Respectfully Submitted,

s/ Megan E. Glor

Megan E. Glor, OSB No. 930178

Attorney for Plaintiff

s/ Andrew Altschul

Andrew Altschul, OSB No. 980302

Attorney for Defendant